

EXHIBIT D

MANNING GROSS + MASSENBURG LLP
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Attorneys for Defendant
CHANEL, INC.
Anna Hwang (NJ ID 361322021)

FILED
AUG 19 2021
SPECIAL MASTER

~~IN RE ASBESTOS LITIGATION~~
~~VENUED IN MIDDLESEX COUNTY~~

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION MIDDLESEX COUNTY

SHARON HARPSTER,

Docket #: L-8173-19 AS

Plaintiff,

ASBESTOS LITIGATION
Civil Action

-against-

DENYING

CHANEL, INC., et al

RECOMMENDATION ~~GRANTING~~
CHANEL INC.'S APPLICATION TO
COMPEL DISCOVERY FROM
PLAINTIFF

Defendants.

THIS MATTER having been opened to the Court by Manning Gross + Massenburg LLP, attorneys for Defendant Chanel, Inc. ("Chanel"), upon notice to all counsel and parties, for entry of a Recommendation granting Chanel's application to compel discovery from Plaintiff; and the Court having considered the application and submission of the parties and for good and just cause shown;

including Chanel's initial Application as well as follow-up submission, and plaintiff's opposition and response to Chanel's supplemental submission (and all exhibits to all submissions)

IT IS on this 19 day of August, 2021;

Chanel's Application to compel

RECOMMENDED that Plaintiff ~~be compelled~~ to provide: (1) available PowerPoint slides identified in Dr. Moline's curriculum vitae, and (2) underlying case information related to her case study, ~~to all defendants on or before the~~ is denied as overbroad, lacking specificity and potentially irrelevant is denied with this issue having been previously decided day of, 2021, and in this jurisdiction;

Chancel's Application to Compel

RECOMMENDED that Plaintiff ~~be compelled~~ to provide an un-redacted copy of Dr.

Moline's invoice bates stamped as "1/9", including related documents bates stamped between

either to defendants or

2/9 and 9/9 for *in-camera* review for determination of whether such materials are discoverable

~~on or before the _____ day of _____, 2021, and~~

is denied with this issue having been decided by the Special Master during Dr. Moline's deposition with defendant being afforded an opportunity and directed to question Dr. Moline with regard to her work as an expert, including but not limited to hourly rate, compensation, time devoted to expert work, number of cases, etc. with defendant having been

IT IS FUTHER RECOMMENDED that a copy of this Recommendation is to be served *provided*

upon all counsel within 3 days of its entry.

with the invoice relevant to this case

Agatha N. Dzikiewicz

AGATHA N. DZIKIEWICZ, ESQ.

Special Master